

Appendix H

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APPENDIX H
Emergency Planning & Community Right-to-Know Act (EPCRA) – Section 313
Estimation Method for Vinyl Chloride Monomer (VCM) and
Vinyl Acetate Monomer (VAM)

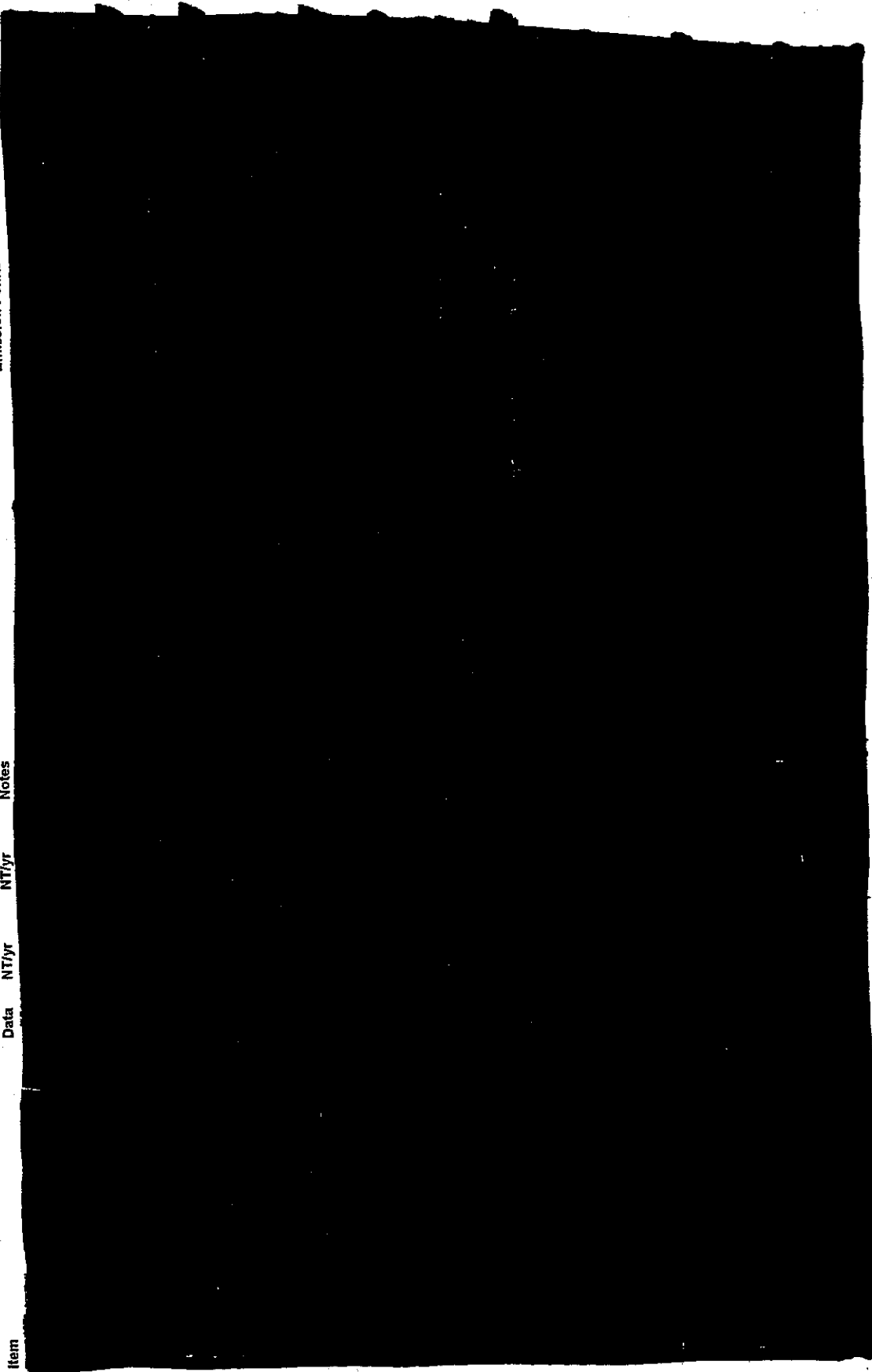
For purposes of completing and submitting EPA Form R (OMB Number 2070-0093) for VCM and VAM, as required by 42 U.S.C. § 11023, FPC-DE shall employ a material balance methodology, using readily available data, engineering calculations and best engineering judgments, to reasonably estimate the VCM and VAM air emissions at the facility. Emission amounts shall be determined for each stack, fugitive and/or non-point air emission source and FPC-DE shall not employ adjustment factors to report stack emissions higher than its actual value as a means of reporting fugitive and/or non-point air emissions.

FPC-DE shall conduct an overall material balance for VCM and/or VAM as a reasonable means of verifying that all VCM and/or VAM has been accounted for at the plant. Attached as part of this appendix is an example of the EPA Form R VCM and VAM estimation method described above in a spreadsheet format.

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TRI Emissions Calculation Analysis - Example - VCM

Item	Value VCM Product, Data	Total NT/yr	VCM TRI emissions, NT/yr	Notes	Emission Points



Prepared at the request of EPA for illustration purposes. Formosa has carried the calculation results to multiple significant digits. EPA Guidance provides that for releases to any medium that amount to 1,000 pounds or more for the year, any estimate need not be reported to more than two significant digits.*

* Toxic Chemical Release Inventory Reporting Forms and Instructions, 2002, Chapter C, Part II, Section 5.

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TRI Emissions Calculation Analysis - Example - VAM

Item	Value VAM Data		Total		VAM TRI emissions, NT/yr		Notes	Emission Points
	Value	NT/yr	Product	NT/yr	emissions, NT/yr	NT/yr		

[REDACTED]								
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* Toxic Chemical Release Inventory Reporting Forms and Instructions, 2002, Chapter C, Part II, Section 5.